

U.S. Department of Justice



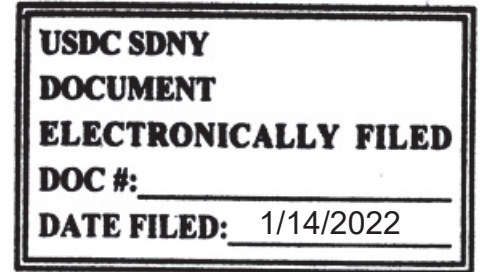
United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 14, 2022

By ECF

The Honorable Robert W. Lehrburger
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007



Re: *Thompson v. Social Security Admin., et al.*, 21 Civ. 2034 (RWL)

Dear Judge Lehrburger:

This Office represents the Social Security Administration ("Government"), defendant in this employment-discrimination action brought by *pro se* plaintiff Tiffany Thompson. Pursuant to Section I.F of the Court's Individual Practices, the parties jointly request a 30-day extension of the time to file the parties' joint letter concerning Plaintiff's proposed amended complaint and a corresponding 30-day extension to the Government's time to respond to Plaintiff's instant complaint.

On January 4, 2022, Plaintiff provided a proposed amended complaint to the Government. On January 13, 2022, the parties had good faith discussions regarding the proposed amended complaint and whether it may obviate the need for the Government's contemplated motion to dismiss. The parties' request for a 30-day extension would allow the parties to continue those good faith discussions concerning the proposed amended complaint. Accordingly, the parties request an extension from January 17, 2022, to February 17, 2022, of the deadline to submit the parties' joint letter and a corresponding extension from January 31, 2022, to March 9, 2022, of the Government's time to respond to Plaintiff's instant complaint.

This is the second request for an extension of the above deadlines.

We thank the Court for its attention to this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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cc: Plaintiff (by ECF)

SO ORDERED:



1/14/2022

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE